

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

In Re Innovatio IP Ventures, LLC, Patent
Litigation

Case No. 1:11-cv-09308

This Document Relates To:

Judge James F. Holderman
Magistrate Judge Sidney Schenkier

All Cases

SUPPLEMENTAL JOINT MOTION TO SEAL CERTAIN TRIAL EXHIBITS

Pursuant to Local Rule 26.2, Innovatio IP Ventures, LLC (“Innovatio”) and Defendants/Declaratory Judgment Plaintiffs in the above captioned-matter, including all represented by the undersigned (collectively “Defendants”) hereby move the Court for entry of the Proposed Order (included as Exhibit A) sealing one additional trial exhibit (DTX 2065) utilized during the recent hearing concerning RAND.

In addition to the Trial Exhibits listed in the parties’ Joint Motion to Seal Portions of the Trial Transcript and Certain Trial Exhibits filed on September 26, 2013 (Dkt. No. 962), the parties propose to seal DTX 2065, which was inadvertently not included in the original list of exhibits to be sealed in Dkt. No. 962.

The parties respectfully request that the Court enter the attached proposed order, which seals DTX 2065.

October 2, 2013

Respectfully submitted,

/s/ Conor Civins

Barry K. Shelton
barry.shelton@bglp.com
Conor M. Civins
conor.civins@bglp.com

BRACEWELL & GIULIANI LLP
111 Congress Avenue, Suite 2300
Austin, Texas 78701
Telephone: (512) 472-7800
Facsimile: (512) 472-9123

Anthony Nimmo
anthony.nimmo@icemiller.com
ICE MILLER LLP
200 W. Madison Street, Suite 3500
Chicago, IL 60606-3417
Telephone: (312) 726-1567
Facsimile: (312) 726-7102

Counsel for Hewlett-Packard Company

/s/ Matthew G. McAndrews

Matthew G. McAndrews
Raymond P. Niro, Jr.
Brian E. Haan
Gabriel I. Opatken
NIRO, HALLER & NIRO
181 West Madison St., Suite 4600
Chicago, Illinois 60602
Telephone: (312) 236-0733
E-mail: mmcandrews@nshn.com
E-mail: rnirojr@nshn.com
E-mail: bhaan@nshn.com
E-mail: gopatken@nshn.com

Jean D. Kuelper
Gregory C. Schodde
Peter J. McAndrews
Ronald H. Spuhler
Shawn L. Peterson
McANDREWS, HELD & MALLOY, LTD.500
West Madison St., Suite 3400
Chicago, Illinois 60661
Telephone: (312) 775-8000
E-mail: jkuelper@mcandrews-ip.com
E-mail: gschodde@mcandrews-ip.com
E-mail: pmcandrews@mcandrews-ip.com
E-mail: rspuhler@mcandrews-ip.com
E-mail: speterson@mcandrews-ip.com

**Attorneys for Plaintiff,
INNOVATIO IP VENTURES, LLC**

CERTIFICATE OF SERVICE

I hereby certify that on October 2, 2013 a true and correct copy of the foregoing **SUPPLEMENTAL JOINT MOTION TO SEAL CERTAIN TRIAL EXHIBITS** was electronically filed with the Court via the CM/ECF system which sent notification of such filing to all Counsel of Record.

Dated: October 2, 2013

/s/ Conor Civins

Conor Civins